

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

GLADYS MENSING.

Plaintiff,

v.

WYETH, INC. (d/b/a WYETH); SCHWARZ PHARMA, INC.; PLIVA, INC.; TEVA PHARMACEUTICALS, USA, Inc.; ALPHARMA, INC., d/b/a ALPHARMA PHARMACEUTICALS; UDL LABORATORIES, INC.; ACTAVIS ELIZABETH LLC; and PUREPAC PHARMACEUTICAL CO., and the following fictitious party defendants (whether singular or plural, individual or corporate): No. 1, that entity which originally obtained permission from the U.S. Food and Drug Administration to market the drug branded Reglan®; No. 2, that entity which obtained permission from the FDA to market the Reglan®, metoclopramide and/or metoclopramide HCl ingested by Gladys Mensing; No. 3, that entity which originally manufactured and sold any Reglan® which was ultimately ingested by Gladys Mensing; No. 4, that entity which originally manufactured and sold any Reglan®, metoclopramide and/or metoclopramide HCl which was ultimately ingested by Gladys Mensing; No. 5, that entity which marketed Reglan® or generic metoclopramide and/or metoclopramide HCl,

Defendants.

Case No. 07-CV-3919 (DWF/SRN)

**AFFIDAVIT OF PAUL
MINICOZZI, Ph.D**

I, Paul Minicozzi, Ph.D., first being duly sworn upon oath, depose and state the following:

1. I have been employed by Wyeth (formerly known as American Home Products Corporation) or one of its subsidiaries since 1990. I am presently the Senior Director, Scientific Affairs. During my tenure with Wyeth, I had various responsibilities for Reglan®. As such, I am knowledgeable about the subjects included within this affidavit. A copy of my curriculum vitae is attached as Exhibit A.

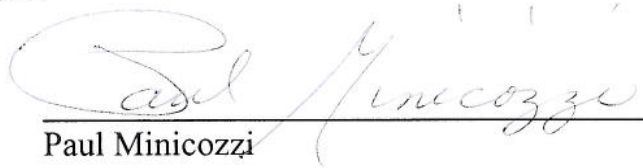
2. Through its subsidiaries, Wyeth (formerly known as American Home Products Corporation) manufactured and distributed Reglan® in three different forms: tablets, injectable and syrup.

3. From approximately 1989 through 2001, Wyeth manufactured and distributed Reglan® tablets. In late December 2001, Wyeth sold the rights to Reglan® tablets to Schwarz Pharma, Inc.

4. From approximately 1995 through 2001, Wyeth has also manufactured and distributed generic metoclopramide through subsidiaries, including ESI Lederle.

5. All forms of Reglan® and generic metoclopramide are available only through a physician's prescription.

FURTHER AFFIANT SAYETH NOT.


Paul Minicozzi

STATE OF Pennsylvania)
) ss.
COUNTY OF Montgomery)

The foregoing Affidavit was acknowledged before me this 11th day of August, 2008 by Paul Minicozzi. My commission expires: Oct. 29, 2011.

Witness my hand and official seal.


Notary Public

